

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF NORTH CAROLINA**

United States of America,

Plaintiff;

v.

Terry Johnson, in his official capacity as
Alamance County Sheriff,

Defendant.

No. 12-cv-1349

**UNITED STATES' MOTION FOR
SUMMARY JUDGMENT**

Exhibit 26

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,

Plaintiff,

v

No. 1:12-CV-1349

TERRY S. JOHNSON, IN HIS OFFICIAL
CAPACITY AS ALAMANCE COUNTY SHERIFF

Defendant.

Deposition

of

RANDY E. DENHAM

In Greensboro, North Carolina

Tuesday, June 18, 2013

8:53 a.m.

ORIGINAL

Reported by:

Victoria L. Pittman, BA, CVR-CM-M
for Margaret Powell, CVR-M
Certified Verbatim Reporter
(919) 779-0322

Randy E. Denham

6/18/2013

1 you know, the A number, you know, the alien number, and
2 they wouldn't have that, you know. And a lot of times,
3 I mean, we would have access to that, we wouldn't know
4 it. It may be somebody that had been arrested and been
5 encountered by us previously, and they had been
6 released back on the street, and we would have access
7 to that information. So, you know, we would have -- we
8 could validate that and say, yes, this is without a
9 doubt this individual, because he's been off a prior
10 encounter.

11 Q How long does it take to run someone's name?

12 A Oh, it don't take no time. I mean, you know,
13 if you've got good information, you just type it in,
14 you know, if you get a hit.

15 Q Okay. How do people at the Sheriff's Office
16 generally refer to Hispanics? What terms have you
17 heard?

18 A All right. Like --

19 Q I should say nothing you say will offend me
20 at all.

21 A Well, let me clarify this question. All
22 right. How do you -- are you saying have I ever heard
23 slang terms? Refer to them in slang? Or have I -- are
24 you asking me have I heard them address that
25 individual?

Margaret M. Powell, CVR-M - (919) 779-0322

Randy E. Denham

6/18/2013

1 Let me clarify this: I've never heard nobody
2 address an individual using a derogatory term. Okay?

3 Now, I have heard slang terms used. Okay?

4 Q What slang terms have you heard used?

5 A Wetback. Tonk. Those, primarily.

6 Q Tonk?

7 A Tonk, yeah.

8 Q How do you spell that?

9 A I don't know. I don't know. And that --
10 well, I don't know where that come from. I just heard
11 somebody come in and use that, and then that was the
12 way they referred them. I don't know where that term
13 generated, where it started.

14 Q And that's a term used to refer to Hispanic
15 people?

16 A It has been, yes.

17 Q A term you consider derogatory?

18 A Yeah, I would.

19 Q What other slang terms have you heard?

20 A Primarily those. That's about it. And I
21 haven't heard a lot of it, you know, but I have heard
22 it in -- people will be talking, you know, and they may
23 refer to a person as being a wetback or something like
24 that.

25 Q What are the contexts in which you hear those

Margaret M. Powell, CVR-M - (919) 779-0322